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February 12, 2025

VIA ECF

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

Dear Judge Netburn:

I write concerning the pending motion on behalf of the Estate of Andrzej Cieslik (ECF 9879 *et seq.*) and in connection with this Court's order regarding the basis for jurisdiction (ECF 10708).

It is our intention to follow the Court's previous decisions regarding claims brought by non-U.S. nationals in our refiled briefing. ECF 10708 at 1. We also need to ensure that our filing covers all potentially open areas of review, including the factual and legal assertions within the underlying operative complaint, the proper service of the complaint, the relevant discussion of applicable state law and an analysis of what, if any, issues may need to be addressed where, as here, the direct victim was not a U.S. national at the time of the terrorist attack (though was naturalized thereafter) but the party presenting the claim was.

Given the somewhat different factual record in connection with the *Ashton* complaint and allegations against Iran than those that this Court addressed in its January 5, 2024 report and recommendation, and in light of commitments in other cases, emergencies that have recently arisen outside of work and previously planned travel, I respectfully request that this Court extend our time to refile the motion until February 28, 2025.

Respectfully submitted,

Kreindler & Kreindler LLP

By: /s/ Megan W. Benett